OFT infringement decisions

- March 2001 – Napp Pharmaceuticals
  - £3.21 million fine, reduced to £2.2 million
- September 2002 – Aberdeen Journals
  - £1.38 million fine, reduced to £1 million
- March 2003 – Genzyme
  - £6.8 million fine, reduced to £3 million
- November 2008 – Cardiff Bus
  - no fine, “conduct of minor significance”
- October 2010 – Reckitt Benckiser
  - agreed to pay £10.2 million fine

Practical issues

- What is the right number of cases?
- Likelihood of OFT intervention
  - Evidential issues
  - Risk assessment
  - Other policy instruments?
- Deterrence
  - Deloitte survey (2007)
  - OFT “Drivers of Compliance” study (2010)
    - reputational damage
    - financial penalties
    - individual sanctions
- Private actions

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